

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:	)	Chapter 11
	)	
W. R. Grace & Co., <u>et al.</u> ,	)	Case No. 01-01139(JKF)
	)	
	)	Jointly Administered
Debtors.	)	Hearing: 9/24/07
	)	Agenda item: 15
	)	Related to Docket No. 16807, 16597, 16259

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**AGREED SUPPLEMENTAL ORDER REGARDING MODIFIED ORDER  
ESTABLISHING THE NON-WAIVER OF PRIVILEGES CONTAINED IN ANSWERS  
TO THE DEBTORS' INTERROGATORIES AND THE SEALING AND  
CONFIDENTIALITY OF SUCH ANSWERS**

This Agreed Supplemental Order relates to the Motion to Alter and Amend the Court's Modified Order Establishing the Non-Waiver of Privileges Contained in Answers to the Debtors' Interrogatories and the Sealing and Confidentiality of Such Answers filed by the Official Committee of Unsecured Creditors dated August 20, 2007 [Docket No. 16597] (the "Motion to Amend"). This Supplemental Order supplements the Modified Order Establishing The Non-Waiver of Privileges Contained In Answers to the Debtors' Interrogatories and the Sealing and Confidentiality of Such Answers, entered on July 10, 2007 [Docket No. 16259] (the "Order").

Upon agreement of the affected parties<sup>1</sup>, consideration of the Motion to Amend and all prior proceedings related to the Order, and any responses thereto and after due and proper notice and a hearing;

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<sup>1</sup> These parties include, without limitation, the following law firms served with the Debtor's Third Set of Interrogatories: Baron & Budd, P.C., Kelley & Ferraro, The Law Offices of Peter G. Angelos PC, Motley Rice, LLC, Kazan, McClain, Abrams, Lyons, Farrise & Greenwood, P.C., Paul, Hanley & Harley, LLP, Alwyn H. Luckey, P.A., Provost Umphrey LLP, Cooney & Conway, Reaud Morgan & Quinn, LLP, Early, Ludwick & Sweeney, LLC, Silber Pearlman, LLP, Ferraro & Associates, P.A., The Wartnick law Firm, Foster & Sear, LLP, Waters & Kraus, LLP, LeBlanc & Waddell, Weitz & Luxenberg, PC, Maples & Lomax, PA, Williams Kherkher Hart Boundas, LLP, Brayton Purcell, LLP, and Edward O. Moody, PA.

The affected parties agree, and it is hereby ORDERED and DECREED, as follows:

1. Any and all information provided to the Debtors in response to the First, Second and Third Set of Interrogatories may be disclosed to (in addition to the parties already permitted access to the information under the Order, including the Debtors, the Official Committee of Asbestos Personal Injury Claimants and the Future Claimants' Representative) the court-approved attorneys for the Official Committee of Unsecured Creditors, the Official Committee of Equity Security Holders, and the Official Committee of Asbestos Property Damage Claimants and their estimation experts (subject to the execution of a document attesting to their agreement to be bound by the Order) (the "Non-PI Committees") in these bankruptcy cases. The attorneys and experts for the Non-PI Committees shall not disclose or otherwise provide access to the information to any other person or entity (including the members of the Non-PI Committees) not expressly permitted access to the information by the terms of the Order or this Supplemental Order. Such information may be used only in respect to the estimation proceedings in these chapter 11 cases and may not be used for any other purpose. The attorneys for the Non-PI Committees, and their experts, shall be bound by all provisions of the Order, including those with respect to the confidentiality of the information.

2. The Motion to Amend is resolved pursuant to the terms of this Supplemental Order.

3. The Order remains in full force and effect except as supplemented hereby.

Dated: September <sup>24<sup>th</sup></sup>~~21~~, 2007

*Judith K. Fitzgerald*

Honorable Judith K. Fitzgerald *JPC*  
United States Bankruptcy Judge